

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

**ALLSTATE INSURANCE COMPANY, ALLSTATE
INDEMNITY COMPANY, ALLSTATE PROPERTY
& CASUALTY INSURANCE COMPANY and
ALLSTATE VEHICLE & PROPERTY
INSURANCE COMPANY**

Plaintiffs

v.

ELECTROLUX HOME PRODUCTS, INC.

Defendant

**Civil Action No.
16-cv-04276**

JURY DEMANDED

**PLAINTIFFS' OMNIBUS RESPONSE IN OPPOSITION TO DEFENDANT,
ELECTROLUX HOME PRODUCT INC.'S MOTIONS IN LIMINE**

Plaintiffs, Allstate Insurance Company, Allstate Indemnity Company, Allstate Property & Casualty Company and Allstate Vehicle & Property Insurance Company, by and through their attorneys, hereby file the foregoing Omnibus Response in Opposition to Defendant's Motions: To Preclude Evidence of the Australian Thesis (ECF No. 126), To Preclude Evidence of Electrolux's Transition to the Bulkhead Dryer Design (ECF No. 127), To Preclude the Admission of Evidence About Other Dryer Fires that Does Not Arise Out of Substantially Similar Incidents (ECF No. 128), To Preclude Evidence or Argument About Electrolux's Failure to Recall or Retrofit its Dryers (ECF No. 130), To Preclude Evidence of an Investigation of Dryer Fires in Japan (ECF No. 131), To Preclude Evidence Relating to Electrolux's Webster City, Iowa and Juarez, Mexico Manufacturing Plants (ECF No. 132), To Preclude the Admission of Evidence About Other Lawsuits (ECF No. 133), To Preclude Evidence About Personal Injuries and Deaths (ECF No. 134), To Preclude Certain Testimony of Michael R. Stoddard, Jr. (ECF No. 135), For Bifurcation (ECF No. 136), For Spoliation Inference (ECF No. 137), and rely on the attached Memorandum of Law in support thereof.

Plaintiffs respectfully request this Honorable Court deny Defendant's Motions and enter the order attached hereto.

Respectfully submitted,

de LUCA LEVINE, LLC

BY: Patrick A. Hughes

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ATTORNEYS FOR PLAINTIFFS

Date: January 15, 2019

CERTIFICATE OF SERVICE

I, Patrick A. Hughes, Esquire, hereby certify that a true and correct copy of Plaintiffs' Omnibus Response in Opposition to Defendant Electrolux's Motions In Limine was served upon counsel of record by the filing of said Motion on the Court's ECF system.

de LUCA LEVINE, LLC

BY: Patrick A. Hughes

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